IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

MAHMOUD KHALIL,

Case No. 25-cv-01963-MEF

Petitioner,

v.

NOTICE OF MOTION FOR PRO HAC VICE ADMISSION OF RAMZI KASSEM

WILLIAM JOYCE ET AL.,

Respondent.

PLEASE TAKE NOTICE that as soon as counsel may be heard, the undersigned, counsel for Petitioner, shall move pursuant to L. Civ. R. 7.1 before the U.S.D.J., United States District Court, District of New Jersey, at the Courthouse located at 50 Walnut Street, Newark, New Jersey 07102 for an Order admitting Ramzi Kassem, to appear before this Court pro hac vice for the purpose of acting as counsel for Petitioner in the above-captioned action.

PLEASE TAKE FURTHER NOTICE that in support of the Motion,
Petitioner shall rely upon the annexed Certification of Ramzi Kassem.

It is respectfully requested that the Court rule upon this Motion without requiring the appearance of counsel, pursuant to Fed. R. Civ. P. 78.

Pursuant to L. Civ. R. 7.1(d)(4), Petitioner submits this statement in lieu of a submission of a formal brief. It is respectfully submitted that no brief in support of this Motion is necessary because the *pro hac vice* admission of Ramzi Kassem under L. Civ. R. 101.1(c) is a matter within the sound discretion of the Court, and Petitioner has submitted with this Motion Certification of Ramzi Kassem and Naz Ahmad in support of the admission.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted with this application.

Dated: March 25, 2025 Res

Respectfully Submitted,

/s/Naz Ahmad

Naz Ahmad

CLEAR PROJECT

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